

REMARKS

Claims 1-21 are pending in the present application.

Claims 1-21 were rejected.

Claims 10, 15 and 20 have been amended.

Claims 1-21 remain in the application.

The Applicants request reconsideration of Claims 1-21 in view of the following arguments.

In Section 1 of the February 26, 2004 Office Action, the Examiner objected to Claims 1, 5, 6, 8, 11 and 13 because of the Applicant's use of the phrase "capable of". The Examiner also objected to the phrase "browser application" instead of "proxy application" in Claim 10. The Applicant has amended Claim 10 in the manner suggested by the Examiner. However, the Applicant has not removed the phrase "capable of" from the claims. The Applicant conducted an on-line search of the United States Patent and Trademark Office (USPTO) database for patents containing the phrase "capable of" in the claims. The search found 191,198 such patents. In view of this result, the Applicant respectfully asserts that the term "capable of" is acceptable claim language.

The Applicant notes that Claims 15 and 20 were amended in order to make grammatical changes to those claims.

In Sections 2 and 3 of the February 26, 2004 Office Action, the Examiner rejected Claims 1-21 under 35 U.S.C. §102(e) as being anticipated by United States Patent Publication No. US 2002/0161928 to *Ndili* (hereafter, simply "*Ndili*"). Among other things, the Examiner rejected Claims 1, 2, 4, 8 and 10 based on paragraphs 41-57, paragraph 66, paragraph 76, paragraphs 117-123

and paragraphs 125-133 of the *Ndili* reference. The Examiner also rejected Claims 3 and 9 based on paragraphs 126 and 136 of the *Ndili* reference and rejected Claims 5 and 11 based on paragraphs 85-108 of the *Ndili* reference.

The Applicant notes that the portions of the *Ndili* reference upon which the Examiner relied to reject, for example, Claim 1, span across several pages of the *Ndili* reference. Yet the Examiner did not point out where the individual limitations in Claims 1 are shown in the *Ndili* reference. The Examiner's rejections of most of the other claims of the present application are similarly lacking in specificity. Thus, for many of the claims, it is impossible to determine which elements in the *Ndili* reference the Examiner believes correspond to which limitations in Claims 1-21. The Applicant requests that any future claim rejection point out the specific portions of the *Ndili* reference (or other reference) that correspond to specific limitations in particular ones of Claims 1-21.

Nonetheless, based on the Applicant's review of the *Ndili* reference, the Applicant respectfully disagrees with the rejections of Claims 1-21. The Applicant directs the Examiner's attention to Claim 1, which contains the unique and non-obvious limitations emphasized below:

1. (Original) For use in a wireless mobile station having predetermined capabilities, an apparatus for converting Web page Hypertext Markup Language (HTML) data into reformatted data that is suitable for rendering on a display of the wireless mobile station, the apparatus comprising:

memory that contains downloaded Web page HTML data, an HTML filter, and an HTML translation script; and

a controller, coupled to the memory, that is capable of executing the HTML filter such that the HTML filter generates the reformatted data from the Web page HTML data in response to the HTML translation script and the predetermined capabilities, the controller is further capable of rendering the reformatted data on the screen. (emphasis added)

The Applicant respectfully asserts that the above-emphasized limitations are not disclosed, suggested, or even hinted at in the *Ndili* reference.

The *Ndili* reference discloses a network device that compares the communication protocols, the programming and markup language, and the natural language used by a mobile device to the communication protocols, the programming and markup language, and the natural language of a network content server. If there are differences, the network device disclosed in the *Ndili* reference converts the communication protocols and the natural language of the content server to that of the mobile station (see Figure 10 of the *Ndili* reference). The network device disclosed in the *Ndili* reference also converts the programming and markup language of the mobile station to that of the network content server (see Figure 10 of the *Ndili* reference).

This is not what is claimed in the present invention. Claim 1 is directed to a mobile station that contains an HTML filter that receives Web page HTML data as input and generates reformatted HTML data as output. Thus, there is no conversion of formats – both the input and the output of the HTML filter are HTML data. Furthermore, the HTML filter reformats the HTML data according to the predetermined capabilities of the mobile station such that the reformatted data is suitable for rendering on the display screen of the mobile station. The *Ndili* reference does not disclose these limitations. In fact, the *Ndili* reference appears to be unconcerned with whether or not the content from the network content server is capable of being displayed on the mobile station. The Applicant

respectfully asserts that the *Ndili* reference provides a different solution to a different problem and thus has no relevance to the claimed invention.

In sum, independent Claim 1 contains patentable subject matter over the *Ndili* reference. Also, dependent Claims 2-7, which depend from Claim 1, contain all of the unique and non-obvious limitations recited in Claim 1. Thus, Claims 2-7 also are patentable over the *Ndili* reference.

Additionally, independent Claims 8, 15 and 20 contain limitations that are analogous to the unique and non-obvious limitations recited in independent Claim 1. This being the case, Claims 8, 15 and 20 are patentable over the *Ndili* reference. Furthermore, dependent Claims 9-14, which depend from Claim 8, dependent Claims 16-19, which depend from Claim 15, and dependent Claim 21, which depends from Claim 20, contain all of the unique and non-obvious limitations recited in Claims 8, 15 and 20, respectively. Thus, dependent Claims 9-14, 16-19 and 21 also are patentable over the *Ndili* reference.

SUMMARY

For the reasons given above, the Applicant respectfully requests reconsideration and allowance of pending claims and that this Application be passed to issue. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@davismunck.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

DAVIS MUNCK, P.C.

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P.O. Drawer 800889
Dallas, Texas 75380
Phone: (972) 628-3600
Fax: (972) 628-3616
E-mail: *jmockler@davismunck.com*


John T. Mockler
John T. Mockler
Registration No. 39,775